

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

In re:)	
)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,)	
)	Chapter 11
Debtor.)	
)	
)	
CDS BUSINESS SERVICES, INC. d/b/a)	
NEWTEK BUSINESS CREDIT,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 3:20-ap-90140
)	
)	
AMERICA CARES TRUST (ACT) d/b/a)	
CARENATION)	
)	
Defendant.)	

REQUEST TO PARTICIPATE BY VIDEO

CDS Business Services, Inc. d/b/a Newtek Business Credit, by and through undersigned counsel, and pursuant to this court's March 9, 2022 Order Regarding Video Appearances for Hearing /Conference on March 10, 2022 [Doc. 343] (the "**Video Participation Order**") seeks permission to participate by video in the hearing identified below and certifies that it will comply with all policies and procedures established by the Court for such matters.

Subject of Hearing: Status Conferences on various motions filed by new counsel for America Cares Trust (ACT) d/b/a CareNation (Motion to reopen case, motion for order of clarification, motion to set aside default judgment in related adversary proceeding, and motions to withdraw as counsel).

Date of Hearing: March 10, 2022

Attorney requesting to appear by video: Daniel H. Puryear

Client of attorney requesting to appear by video: CDS Business Services, Inc. d/b/a
Newtek Business Credit

Nature of Client's Involvement in the case: assignee of sale proceeds in main bankruptcy case (case. 3:19-bk-1971) and judgment creditor in related adversary proceeding (3:20-bk-90140).

Anticipated extent of participation in Hearing: Undersigned counsel intends to provide relevant factual background omitted from certain of the pending CareNation motions for which the court has set these conferences.

E-mail address to provide video access link and additional instructions:
dpuryear@puryearlawgroup.com

Any other information pertinent to request: This request is filed in both the above captioned bankruptcy case and the related adversary proceeding. Though the court entered its Video Participation Order under the caption of only the main bankruptcy case, undersigned counsel presumes that since the court set the Status conference on all pending motions at the same time, the court's video Participation Order was intended to apply in both the main case and the adversary case,

Dated: March 10, 2022

Respectfully submitted,

/s/ Daniel H. Puryear

Daniel H. Puryear, #018190

M. Andrew Pippenger, #018183

Puryear Law Group PLLC

104 Woodmont Boulevard, Suite 201

Nashville, TN 37205

615-630-6601 (phone)

615-630-6602 (fax)

dpuryear@puryearlawgroup.com

apippenger@puryearlawgroup.com

*Counsel for CDS Business Services, Inc.
d/b/a Newtek Business Credit*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via the Court's electronic filing system upon all parties having entered appearances therein.

/s/ Daniel H. Puryear

Daniel H. Puryear

